




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

JUN 15 2000

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations for the General Electric/
Pittsfield Housatonic River Site

FROM: Bruce K. Means, Chair 
National Remedy Review Board

TO: Patricia L. Meaney, Director
Office of Site Remediation and Restoration
EPA Region 1

Purpose

The National Remedy Review Board (NRRB) has completed its review of the proposed Superfund cleanup action for the General Electric (GE)/Pittsfield Housatonic River site. This memorandum documents the NRRB's advisory recommendations.

Context for NRRB Review

The Administrator announced the NRRB as one of the October 1995 Superfund Administrative Reforms to help control response costs and promote consistent and cost-effective decisions. The NRRB furthers these goals by providing a cross-regional, management-level, "real time" review of high cost proposed response actions prior to their being issued for public comment. The board reviews all proposed cleanup actions that exceed its cost-based review criteria.

The NRRB review evaluates the proposed actions for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and relevant Superfund policy and guidance. It focuses on the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, state/tribal, and other stakeholder opinions on the proposed actions, and any other relevant factors.

- Pre-decisional; not for distribution -

Generally, the NRRB makes “advisory recommendations” to the appropriate regional decision maker. The region will then include these recommendations in the Administrative Record for the site before it issues the proposed response action for public comment. While the region is expected to give the board’s recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of response options, may influence the final regional decision. The board expects the regional decision maker to respond in writing to its recommendations within a reasonable period of time, noting in particular how the recommendations influenced the proposed cleanup decision, including any effect on the estimated cost of the action. It is important to remember that the NRRB does not change the Agency’s current delegations or alter in any way the public’s role in site decisions.

Overview of the Proposed Action

EPA Region 1 proposes to conduct a non-time critical removal action for the General Electric(GE)/Pittsfield Housatonic River site. It would excavate riverbank soil and sediments in a 1½-mile reach of the Housatonic River from Lyman Street to the confluence of the East and West branches. This would involve approximately 43,200 cubic yards of sediment and 46,500 cubic yards of riverbank soil. The excavation would be “in the dry,” using a combination of sheet piling and/or pumps to bypass river water. The proposal would rely on environmental restrictions and easements to protect people from contamination remaining after the action is complete. General Electric, under a proposed consent decree, will pay most of the cleanup costs for the 1½ mile reach. (The consent decree also requires GE to clean up properties beyond the top of the bank, contaminated areas on or adjacent to the GE facility, and the Housatonic River and its flood plain down stream of the confluence.) The primary contaminant of concern is polychlorinated biphenyls (PCBs), which have been found in moderate to high concentrations in the riverbank soil and river sediments throughout this reach of the Housatonic River.

NRRB Advisory Recommendations

The NRRB reviewed the informational package for this proposal and discussed related issues with EPA’s Brian Olson, Chet Janowski, and John Kilborn on March 14, 2000. Based on this review and discussion the board offers the following comments.

- The written materials presented to the board did not include a clear rationale for the one part per million (ppm) polychlorinated biphenyl (PCB) removal level for river sediments. Subsequent materials and discussions helped to clarify the rationale. The board recommends that the region clearly describe the process for the selection of the one ppm PCB removal level for river sediments in the action memorandum/decision document for this action.
- While the information presented to the board demonstrated elevated human health risks supporting this proposed cleanup of 1.5 miles of river, it did not include human health risks related to consuming contaminated fish, which increases overall site risks. The board recommends that the decision document for this action acknowledge the risks due to Housatonic River fish consumption, and that this action is an important component in the site-wide strategy to reduce those risks.

- The information presented to the board states that the contaminated river banks in residential areas could be excavated to a depth of up to 15 feet. The board believes the proposed excavation depth of 15 feet may be overly protective for river bank soils and may add significantly to the cost of soil or sediment removal. The board recommends that the Region reconsider the 15 foot excavation criterion for river bank soils.
- The rationale for the three foot maximum depth of excavation for “recreational” land use is unclear in the written materials presented to the board. The board notes that this depth is based in part on ecological receptors, among other factors not typically associated with “recreational” land use. The board recommends the region better describe the rationale for this excavation depth in the action memorandum/decision document.

The NRRB appreciates the region’s efforts to work closely with the state and community groups at this site. We encourage Region 1 management and staff to work with their regional NRRB representative and the Region 1/9 Accelerated Response Center in the Office of Emergency and Remedial Response to discuss any appropriate follow-up actions.

Thank you for your support and the support of your staff in preparing for this review. Please give me a call at 703-603-8815 should you have any questions.

cc: S. Luftig
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OERR Regional Center Directors